

Joseph Mulieri
Vice President
Federal Regulatory



1515 N. Court House Road
5th Floor
Arlington, VA 22201

703 351-3096
703 351-3652 fax

June 8, 2005

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Petition for Waiver of Pricing Flexibility Rules for Fast Packet Services; Petition for Forbearance Under 47 U.S.C. Section 160 (c) from Pricing Flexibility Rules for Fast Packet Services, WC Docket No. 04-246

Dear Ms. Dortch:

On June 3, Julie Chen Clocker, Fred Moacdieh, and the undersigned met with Tamera Preiss, Judith Nitsche, Margaret Dailey, James Lichford, and Marvin Sacks of the Competitive Pricing Division to discuss the above captioned proceeding. During the meeting Verizon reiterated its position that fast packet services should be eligible for the same pricing flexibility afforded companion special access services. Additionally, Verizon is submitting the attached document which provides a list of the current services that are addressed in Verizon's pending petitions for waiver, or forbearance, of the pricing flexibility rules for fast packet services.

The attached document is being provided today, via e-mail, to Tamera Preiss, Judith Nitsche, Margaret Dailey, Marvin Sacks, and James Lichford of the Competitive Pricing Division. Please do not hesitate to contact me with any questions.

Sincerely,

/s/Joseph Mulieri

Attachment

cc: T. Preiss
J. Nitsche
M. Dailey
J. Lichford
M. Sacks

**Petitions for Waiver or Forbearance from Pricing Flexibility Rules For Advanced
Services
WC Docket No. 04-246**

Tariff No. 20 Services Covered by the Petition

I. INCLUDED SERVICES

Verizon's petitions for waiver or forbearance include the following service categories under FCC Tariff No. 20, which include those that were transferred initially when VADI was re-integrated, as well as those that have been introduced in FCC Tariff No. 20 since the initial transfer:

❖ Frame Relay Service

Frame Relay Service (FRS) is a medium to high-speed connection-oriented packet switched data service that allows for the interconnection of Local Area Networks (LAN) or other compatible customer equipment across a wide area for the purpose of interstate access. FRS allows for the transfer of variable length frames (packets).

FCC No. 20

Part I, Section 5.1 Frame Relay Service (North)
Part I, Section 5.8 Exchange Access FRS (South)
Part II, Section 5.2 Frame Relay I (West)
Part II, Section 5.3 Frame Relay II (West)
Part II, Section 5.9 Frame Relay III (West)

❖ Transparent LAN Service

Transparent LAN Service (TLS) is a high-speed packet-based data service which uses a shared fiber network to allow for the interconnection of Local Area Networks (LANs) across selected metropolitan areas. TLS includes Ethernet TLS (within a LATA) and National TLS (allows for interconnection of Ethernet TLS between LATAs).

FCC No. 20

Part I, Section 5.3 Transparent LAN Service (East)
Part II, Section 5.11, Transparent LAN Service (West)

❖ ATM Cell Relay Service

ATM CRS is a fast-packet, cell-based technology that can support user applications requiring high-bandwidth, high-performance transport and switching.

This connectivity is provided via Permanent Virtual Circuits (PVCs) and/or Switched Virtual Circuits (SVCs) that are implemented over access facilities and switches that are dedicated to high-speed telecommunications services.

FCC No. 20

Part I, Section 5.6 Enterprise ATM Cell Relay Service (North)

Part I, Section 5.9 Exchange Access Asynchronous Transfer Mode Cell Relay Svc
I (South)

Part I, Section 5.10 ATM Cell Relay Service (East)

Part II, Section 5.4 High Capacity Broadband Access Cloud (West)

Part II, Section 5.5 Asynchronous Transfer Mode Network Service I (West)

Part II, Section 5.6 Asynchronous Transfer Mode Network Service II (West)

Part II, Section 5.10 Asynchronous Transfer Mode Cell Relay Service (West)

❖ Internet Protocol – Virtual Private Network (IP-VPN) Service

Internet Protocol - Virtual Private Network (IP-VPN) Service is a connection-less, packet-based advanced data service that provides connectivity between Customer locations. Some uses of IP-VPN Service include enabling business customers to communicate with branch offices, to exchange corporate network traffic, and to establish communication with external partners such as customers, business partners and suppliers.

FCC No. 20

Part I, Section 5.12 (East)

Part II, Section 5.12 (West)

❖ Exchange Access Switched Multi-Megabit Data Service

Exchange Access Switched Multi-Megabit Data Service (XASMDS) is a connectionless, packet-switched data service allowing for the interconnection of Local Area Networks (LANs) or other compatible customer equipment across a wide area for the purpose of interstate access. This service is scheduled to be withdrawn from the tariff by December 2004.

FCC No. 20

Part I, Section 5.4 Exchange Access Switched Multi-Megabit Data Service I
(NY/Corridor)

Part I, Section 5.7 Exchange Access Switched Multi-Megabit Data Service II
(South)

❖ Subcomponents, Rate Elements and Features

All Subcomponent, rate elements and features within the FCC Tariff No. 20 Sections 4 and 5 that apply to the services listed above.

❖ Future Services

All future new services using packet-based technology that will be introduced in FCC Tariff No. 20 (except for those falling under the exclusions noted below).

II. EXCLUDED SERVICES

❖ DSL Services

All DSL services and associated subcomponents, rate elements and features (FCC Tariff No. 20, Part I Section 5.2, Part II Sections 5.7 and 5.8, Part III Sections 5.1, 5.2, 5.3, and 5.4, and Part IV Sections 1.1 and 1.2).

❖ Government Services

Services offered to customers for use only by agencies or branches of the Federal Government and other users authorized by the Federal Government, including services provided to state emergency operations centers (FCC Tariff No. 20 Part I Section 5.11).

❖ Promotions

Promotions listed in FCC Tariff No. 20 Section 6.

❖ Specialized Services

Specialized services or arrangements in FCC Tariff No. 20 Section 8.